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August 18, 2005

Electronic Filing - Via ECFS  
Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

**Re: WC Docket 05-196; Subscriber Notification Report and Compliance Letter  
for Worldcall Internet, Inc.**

Dear Ms. Dortch:

Submitted herewith is the Subscriber Notification Report and Compliance Letter for Worldcall Internet, Inc. as required by the Commission (and clarified by the Enforcement Bureau) in Docket 05-196. Please refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,



W. Scott McCollough  
General Counsel, Worldcall Internet, Inc.

## WC Docket No. 05-196; Worldcall Internet, Inc. Subscriber Notification Report and Compliance Letter

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### Report

*Detailed description of all actions the provider has taken to specifically advise every subscriber, prominently and in plain language, of the circumstances under which E911 service may not be available through the interconnected VoIP service and/or may be in some way limited by comparison to traditional E911 service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers.*

On August 12, 2005, Worldcall Internet, Inc. ("Worldcall Internet") sent e-mails to each of its retail customers with the following content:

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Dear Worldcall Internet Customer:

In accordance with a recent Federal Communications Commission (FCC) Order regarding enhanced 911 ("E911") and Voice over Internet Protocol ("VoIP") services, we would like to take this opportunity to provide you with the following important information regarding the Worldcall Internet E911 service. Worldcall Internet E911 service will soon be a required element of your service plan and customers must be made aware of the limitations of calling 911 from their Worldcall Internet VoIP service.

**Please review the content of this email in its entirety and, when you have finished, hit "Reply" to this email to let us know you have read and understand the features and limitations of Worldcall Internet E911 service. This is a requirement by the FCC and, without your acknowledgement; we will no longer be able to offer you Worldcall Internet VoIP service.**

Also, please note that Worldcall Internet's E911 service applies only to the United States E911 system. If you are using Worldcall Internet service outside of the United States in a country where the calling code 9-1-1 is used to reach emergency services, Worldcall Internet's E911 service will not work in these foreign jurisdictions.

With certain exceptions, Worldcall Internet E911 service already substantially mimics E911 provided by traditional landline phone companies when you are using the service at the location you provided to us when service was established. However, we are required by FCC rules to send you this additional notice that, under certain circumstances, when you dial 911 from a device connected to Worldcall Internet service, E911 service may not be available, or E911 service may be in some way limited by comparison to traditional 911 service. These circumstances are:

- ⇒ The relocation of your Worldcall Internet phone device to a physical address other than that which you provided when you activated your account.
- ⇒ Instances where a customer's broadband phone device fails or is not configured properly.
- ⇒ An electrical power outage, broadband internet service outage or

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suspension/disconnection of Worldcall Internet service due to billing or other issues.

- ⇒ A delay in the provision of Worldcall Internet service at the physical address provided at the time of account activation, or at any other location to which you may later move the Worldcall Internet broadband phone device, due to the time required to process automatic number and location information to be provided to local emergency service operators. FCC regulations, effective 11/28/05, require that 911 calls be transmitted, along with automatic number identification and automatic location information, to the appropriate local public safety answering point. Automatic number identification and location information is typically populated into E911 databases within approximately seven (7) days after you provide it to Worldcall Internet. However, no guarantees can be made that automatic number and location information will be available to emergency service operators and your service activated (or reactivated at a new location) within this schedule since total accomplishment of this objective in several respects relies on the cooperation of entities other than Worldcall Internet.
- ⇒ Instances where the local emergency service operator receiving Worldcall Internet E911 emergency service calls may not have a system configured for E911 services or be able to capture and/or retain automatic number or location information.
- ⇒ Due to technical factors in network design and in the event of network congestion on the Worldcall Internet network, there is a possibility that a Worldcall Internet E911 call may produce a busy signal or experience unexpected answering wait times and/or take longer to answer than 911 calls placed via traditional, legacy, circuit-switched telephone networks.
- ⇒ The incorrect identification (at the time of activation) of the actual location where the Worldcall Internet equipment will be located. If the Worldcall Internet customer fails to accurately report the actual location where the Worldcall Internet equipment will be located at the time of activation of the service, Worldcall Internet E911 communications may not be directed to the correct local emergency operator.

**The FCC has required all VoIP service providers to interrupt service on August 30, 2005 to any customer that does not return an affirmative acknowledgment by August 29, 2005. So that we may continue to offer you Worldcall Internet VoIP service, please hit "Reply" to this email, which when received by Worldcall Internet will constitute acknowledgement of receipt.**

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Thank you for your prompt attention to this matter. And thanks again for being our customer.

Best Regards,  
Customer Service  
**Worldcall Internet, Inc.**

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On the same date (August 12, 2005), Worldcall Internet began tracking in its central customer account database those customers who had affirmatively acknowledged the above e-mail and those who had not.

*Quantification of how many of the provider's subscribers, on a percentage basis, have submitted an affirmative acknowledgement, as of the date of the report, and an estimation of the percentage of subscribers from whom they do not expect to receive an acknowledgement by August 29, 2005.*

As of August 17, 2005, 100% of Worldcall Internet's retail customers have submitted an affirmative acknowledgement. An estimate of the percentage of customers from whom it does not expect to receive an acknowledgement by August 29, 2005 is 0%.

*Detailed description of whether and how the provider has distributed to all subscribers warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructing the subscriber to place them on and/or near the customer premises equipment used in connection with the interconnected VoIP service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (i.e. e-mail, U.S. mail).*

On August 12, 2005, Worldcall Internet mailed (via U.S. postal mail) the attached letter containing eight or more stickers to each of its customers. The letter and sticker content is attached below. On the same date, Worldcall Internet also began including a set of 8 stickers in each set of Customer Premise Equipment (CPE) shipped from Worldcall Internet's fulfillment centers.

*A quantification of how many subscribers, on a percentage basis, to whom the provider did not send the advisory described in the first bullet above and/or to whom the provider did not send warning stickers or other appropriate label as identified in the bullet immediately above.*

0 (zero) %

*A detailed description of any and all actions the provider plans on taking towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory, including, but not limited to, disconnecting the subscriber's VoIP service with Worldcall Internet no later than August 30, 2005.*

Worldcall Internet's outbound e-mails and interactive systems specifically stated that customers who did not affirmatively acknowledge by August 29, 2005 would have their VoIP services from Worldcall Internet interrupted.

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*Detailed description of how the provider is currently maintaining any acknowledgements received from its subscribers.*

The acknowledgements from our customers are being maintained as a field in our central customer account database. Information from customers who acknowledge in response to our e-mails is entered directly into this database.

*The name, title, address, phone number, and e-mail address of the person(s) responsible for Worldcall Internet's compliance efforts with the VoIP E911 Order.*

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Chairman & CEO  
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[Lowell@worldcall.net](mailto:Lowell@worldcall.net)

**August 12, 2005 Letter with attached Stickers**

***Worldcall Internet, Inc.***

1250 South Capital of Texas Highway  
Building 2, Suite 235  
Austin, Texas 78746

August 12, 2005

**IMPORTANT INFORMATION ABOUT WORLDCALL INTERNET VoIP SERVICES AND  
E911**

Dear Worldcall Internet customer:

The Federal Communications Commission recently issued an order requiring most companies offering Voice over Internet Protocol (“VoIP”) services to inform their customers that when 911 is dialed from a VoIP-based communications device, service may be limited by comparison to traditional 911 service. All Worldcall Internet customers with a billing address in the U.S. must acknowledge receipt of this notice by August 29, 2005 in order to continue receiving service after that date. If you have not already done so, please reply to the emails recently sent to you by Worldcall Internet.

To alert all potential users of the service you obtain from Worldcall Internet to this potential limitation, we are providing the attached stickers to be placed on or near your communications devices. Please place a sticker on each device you, your employees or other persons use in association with your service.

Thank you.

***Worldcall Internet, Inc.***

